

# **EXHIBIT A**

**DECLARATION OF SCOTT SPEAR**

I, Scott Spear, declare as follows:

1. I am an individual over the age of eighteen. I submit this Declaration based upon my own personal knowledge and, if called as a witness, could and would competently testify thereto under oath.

2. I submit this declaration in support of my Joinder in James Larkin's Motion to Vacate or Modify Seizure Warrants (the "Motion") with which this declaration is being concurrently filed.

3. I am a legal and/or beneficial owner of, or hold a direct or indirect interest in, the following assets and their contents (the "Subject Assets"):

- a. National Bank of Arizona safety deposit box number ending in xx7224;
- b. Ally Bank account number ending in xx6292;1
- c. National Bank of Arizona account number ending in xx3645;
- d. National Bank of Arizona account number ending in xx0178;
- e. National Bank of Arizona account number ending in xx0151;
- f. Live Oak Bank account number ending in x6910;
- g. Ascensus Broker Dealer Services account number ending in xx6943-01;
- h. Ascensus Broker Dealer Services account number ending in xx5280-01;
- i. BBVA Compass Bank account number ending in xx3873; and
- j. BBVA Compass Bank account number ending in xx4862.

4. I did not give permission or otherwise consent to the government's seizure of the Subject Assets.

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I will note that the government seized the National Bank of Arizona account number ending in xx7224 and the Ally Bank account number ending in xx6292 in the related civil seizure case numbers 18-MJ-00719 and 18-MJ-00724, respectively, but has since returned those accounts. However, it appears those seizure cases remain pending, and so I am including these accounts in this declaration.

